PINE COURT HOUSING ASSOCIATION

PRIVACY NOTICE

At Pine Court Housing we take the protection, privacy, confidentiality and security of your personal data very seriously. This Privacy Notice will inform you as to how we look after your personal data that we collect when you utilise our services or work with us in the provision of our services. You will also find information about your privacy rights and how the law protects you.

This notice sets out our commitment to protecting personal data and is designed to comply with the United Kingdom General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 with effect from 25th May 2018.

This Privacy Notice is provided in a layered format so you can click through to the specific areas set out below.

1. Who we are and the purpose of this Privacy Notice
2. Changes to the Privacy Notice and your duty to inform us of changes
3. How is your personal data collected?
4. Our processing of your personal data
5. Personal data of children
6. CCTV
7. Call recordings
8. Communicatons
9. Disclosures of your personal data
10. International transfers
11. Data security
12. Data retention
13. Your legal rights
14. Automated decision making
15. Contact details

Who we are and the purpose of this Privacy Notice

This Privacy Notice aims to give you information on how Pine Court Housing Association collects and processes your personal data.

We obtain your personal data in order to conduct our normal business operations as a registered social housing provider. How we use your personal identifiable information depends on the products and services we provide to you, whether you are a prospective tenant, existing tenant, former tenant, occupant of one of our properties or you work with us to provide our services.

Pine Court Housing is a controller and responsible for your personal data (for simplicity throughout this notice "we", "us" or "our" means Pine Court Housing Association in this privacy policy).

Pine Court Housing is part of the The Sovini Group which is made up of different legal entities, details of which can be found here https://sovini.co.uk/

Back to top

Changes to the Privacy Notice and your duty to inform us of changes

We keep our Privacy Notice under regular review. This version was last updated in November 2026. Historic versions can be obtained by contacting us.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Back to top

How is your personal data collected?

We use different methods to collect data from and about you including through face-to-face contact, email, telephone, written correspondence, forms on our website or receiving this information from others.

We can also receive information about you from other people who know you or are linked to you, for example: relatives, persons nominated to act on your behalf or your legal representative.

Some further examples of how we may gather your personal data are set out below:

Directly from you: for example: when you fill out an application form.

From other organisations: such as Property Pool Plus, former housing and support providers, health and social care agencies, law enforcement agencies, debt collectors, energy or utility companies, benefit agencies and/or credit reference and fraud prevention agencies.

From other people who know you: including joint tenants and people you are linked to or live in the same community as you, for example with regard to reports of anti-social behaviour.

Throughout the course of your tenancy: as part of customer interaction which may be face to face, via telephone, digitally or through any forms given to you during the course of your tenancy.

Back to top

Our processing of your personal information

We collect varying information about you and use it for different reasons according to the relationship we have with you. For example, we will collect different personal information depending on whether you are a prospective tenant, existing and former tenant, occupant or from an entity we work with when providing our services (called a “business partner” below).

In order to make this notice as user friendly as possible, we have split it into different sections. Please click on the section below that best describes your relationship with us.

Prospective tenants
Existing and former tenants
Next of Kin and Emergency Contact Details
Occupants
Business Partners
Members of the Public
Independent Living Tenants

Board Members

Back to top

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, a tenancy agreement). In this case, we may have to cancel an agreement you have with us but we will notify you if this is the case at the time.

Back to top

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the details set out below

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Back to top

Personal data of children

Our tenants are over 18 which means we do not usually process the personal data of children. However we record children's basic information if they are resident in one of our properties, including their name and date of birth. This is required for checking the property is not overcrowded and to assess other tenancy management issues where all householders and ages are required to be known. We also will be provided with, will process and share the personal data of children where safeguarding issues arise in one of our properties. Where a safeguarding issue arises we will be required to liaise with the police, social services and other support agencies.

Back to top

CCTV

Some of our locations and offices have closed circuit television (CCTV) and you may be recorded when you visit them. We use CCTV to provide security and protect both our visitors and communities.

We will only view CCTV when it is necessary to do so, for example to detect or prevent crime. We store the footage for a set period of time after which it is recorded over. We ensure that we comply with the ICO's CCTV Code of Practice and we put up notices so you know when CCTV is used.

Call recordings

We record calls made to our customer service centre to help us review our performance and investigate claims or complaints and for dealing with anti-social behaviour.

We process this personal information in the legitimate interest and for public tasks where it is necessary to perform a public task or function for Pine Court Housing Association and our tenants. An example of this would be for evidence of anti-social behaviour.

Back to top

Communications

Most of our communications with customers, enquiries and third parties are facilitated by either telephone calls, e-mails and/or letters. We also at times correspond via messaging and instant messaging services, such as:-

- The provider WhatsApp, Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. Further details on data processing can be found in the WhatsApp privacy policy at https://www.whatsapp.com/legal/#privacy-policy.

  The use of WhatsApp is based on our legitimate interest in communicating as quickly and effectively as possible with customers, interested parties and other business and contractual partners (Art. 6(1)(f) GDPR). If a corresponding consent has been requested, data processing is carried out exclusively on the basis of the consent; this consent may be revoked at any time with effect for the future.

- Short Messaging Service (SMS) – text messaging.

  The use of SMS is based on our legitimate interest in communicating as quickly and effectively as possible with customers, interested parties and other business and contractual partners (Art. 6(1)(f) GDPR).

- Facebook Messenger – we only reactively respond to enquiries made via Facebook Messenger in order to direct the individual to the Customer Service Centre whereby their enquiry will be referred to the appropriate department.

Please note that we will never share any sensitive data via the above methods.

Back to top

Disclosures of your personal data

We may share your personal data with the following categories of recipients;

- Other housing associations, housing providers and landlords.
- Telephone/care response services.
- Local Authorities in relation to council related services such as social services, environmental services, housing benefits and council tax.
- Government departments, such as Department for Work and Pensions and agencies, who for example, assist with support and safeguarding services.
- The emergency services.
- The police and the probation service.
- Health service providers.

- Independent support groups and agencies. We may make suggestions and recommendations to you about services that may be of interest to you, including, cost of living support, financial support, welfare support and advice services.
- Bodies that regulate us such as the Regulator of Social Housing.
- The Courts and Citizens Advice Bureau.
- Third party service providers who help us to deliver our services to you, this can range from utility companies, maintenance contractors, entities that help financial inclusion support to software and infrastructure providers which help you to access our services.
- Utility companies (including utility brokers) to ensure that you are supplied with energy and water.
- Our professional advisors such as auditors and legal advisors.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Back to top

International transfers

Pine Court Housing Association may occasionally process your personal information overseas. This will be for the storage of data in systems that are cloud based, cloud adoption is now around 90% in the UK.

When processing data in this way PCHA have to ensure that cloud services are compliant and that systems and applications are adhering to current United Kingdom General Data Protection Regulation (UK GDPR and Data Protection Act 2018.

We will not share your information with countries or organisations who are outside of the European Economic Area (EEA) unless to a country or an international organisation that has an appropriate “adequacy decision”; such countries include: Andorra, Argentina, Canada, the Faroe Islands, Guernsey, Israel, the Isle of Man, Japan, Jersey, New Zealand, Switzerland and Uruguay. Transfers are also allowed where “appropriate safeguards” have been put in place.

Back to top

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Back to top

Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

Details of retention periods for different aspects of your personal data are in a table below:

Document	Recommended Period	Comments	Derivation (Legislation/Regulation)
Application and Tenancy Records			
Applications for Accommodation	6 years after acceptance	Statutory requirement	Limitation Act 1980
Housing Benefit Notifications	2 Years	CIH Recommendation	CIH Recommendation & (Social Security (claims and information) (amendment) Regulations 2010, Limitations Act 1980)
Complaints	Current year plus 2 years	Housing Ombudsman Recommendation	CIH Recommendation
Former Tenants' Tenancy Files	A maximum 6 years including, applications and rent payment records	Statutory requirement	Limitation Act 1980
Former Tenants' Tenancy Agreements	6 years after end of tenancy	Statutory requirement	Limitation Act 1980
Action Plans for adults.	8 years after the end of tenancy or service	Legal requirement.	Records Management Code of Practice for Health and Social Care 2016
Documentation from other agencies relating to special needs of current tenants	Keep for duration of tenancy only	Statutory requirement- *Information held on a 'need to know' basis due to sensitivity of medical and social service records.*	UK GDPR & DPA, 2018

Records relating to offenders, ex-offenders and persons subject to cautions	Keep for duration of tenancy only	Statutory requirement- *Information held on a 'need to know' basis due to sensitivity of medical and social service records*.	UK GDPR & DPA, 2018
ASB Case Files and Associated Documents	5 Years / or until end of legal action	Good Practice	Industry recommendation
Property Records			
Rent Registrations	Permanently	Rent Officer Recommendation	Rent Officer Recommendation
Fair Rent Documentation	6 Years	Rent Officer Recommendation	Rent Officer Recommendation
Leases	12 years	Statutory requirement - *15 years after expiry or termination Lease and all liabilities*	Limitation Act 1980
Deeds	Permanently or when the property has been disposed	Statutory requirement	Limitation Act 1980
Wayleaves, Licences and easements	12 years after rights given	Statutory requirement	Limitation Act 1980
Abstracts of Title	12 Years after interest ceases	Statutory requirement	Limitation Act 1980
Planning and Building Control Permission	12 Years after interest ceases	Statutory requirement	Limitation Act 1980
Searches	12 Years after interest ceases	Statutory requirement	Limitation Act 1980
Property Maintenance Records	6 Years	Statutory requirement	Limitation Act 1980
Marketing Information			
Photographs of community projects	Kept as long as required	Business need	Business need and Managing Business Archives 2012.

Call Recordings			
Calls	Kept for 7 days	Business and legal requirement	UK GDPR/Data Protection 2018

Back to top

Your Legal Rights

Under Certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

"Request access" to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

"Request correction" of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

"Request erasure" of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

"Object to processing" of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

"Request restriction of processing" of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
If you want us to establish the data's accuracy.
Where our use of the data is unlawful but you do not want us to erase it.
Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

"Request the transfer" of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

"Withdraw consent at any time" where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

"Right to raise a complaint" about the handling of your personal data if you believe there has been an infringement of UK GDPR or data protection legislation. An acknowledgement of receipt will be provided within 30 days.

If you wish to exercise any of the rights set out above, please contact our Data Protection Officer-

Data Protection People.
Email address: dpenquiries@sovini.co.uk
Postal address: Pine Court Housing Association PO Box 891. Orpington, BR6 1LY.

Telephone number: 0151 709 6878

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Back to top

Automated decision making

We do not make automated decisions about you.

Back to top

Contact details

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below;

DPO: Data Protection People
Email address: dpenquiries@sovini.co.uk
Postal address: Pine Court Housing Association, PO Box 891. Orpington, BR6 1LY.
Telephone number: 0151 709 6878

You have the right to make a complaint at any time to the Information Commission (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the Information Commission so please contact us in the first instance.

Back to top